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10 IN THE UNITED STATES BANKRUPTCY COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO

13 IN THE MATTER OF: CASE NO. 24-22754-A-13C
14 Tran, My Tra H. DOCKET CONTROL #:PGM-1
15 SS#XXX-XX-6668 DATE: October 8, 2024
16 TIME: 9:00 a.m.
17 DEPT#: A - Courtroom 28
18 _____/ Debtor Honorable Judge Clement

19 **MOTION TO CONFIRM DEBTOR'S FIRST AMENDED PLAN**
20 **FILED ON SEPTEMBER 3, 2024**

21 Debtor moves the Court for an Order Confirming the First
22 Amended Plan, which was filed on or about September 3, 2024.

23 This Motion is based on the following:

- 24 1. That on June 25, 2024, Debtor filed a Chapter 13 to
25 reorganize their debts.
26 2. The Debtor has paid a total of \$6,000.00 to the Chapter
27 13 Trustee through August 2024.
28 3. The Debtor proposes to remit plan payments of \$8,560.00
starting September 25, 2024 for 3 months and a lump sum of

1 \$250,000.00 for sale of real property to complete the Plan within
2 the maximum term allowed by law.

3 4. The Plan term is 36 months, with no less than 100% to
4 general unsecured creditors.

5 5. After review and analysis the Debtor's assets are fully
6 exempt as evidenced by the true and correct Liquidation Analysis
7 marked as Exhibit A. This print-out shows, the total assets, the
8 total value of the assets and the amount exempt.

9 6. The Motion and proposed plan complies with 11 U.S.C. §
10 1325(a), 1329(a), § 1322(b), § 1323(c) and all other applicable
11 provisions of the code.

12 7. That the plan has been proposed in good faith and not by
13 any means forbidden by law, as evidenced in the Declaration of
14 Debtor.

15 8. That all installment fees, charges, or amounts required
16 by the Court, have been paid by the Debtor.

17 9. The plan as proposed provides for the following
18 creditors;

19 a) Class 1 claim(s); On going mortgage and post petition
20 Rushmore Ocwen Loan Servicing

21 b) Class 2 claim(s); Irs and State Farm

22 c) Class 3 claim(s); None

23 d) Class 4 claim(s); PHH Mortgage

24 e) Class 5 claim(s); FTB and IRS

25 f) Class 6 claim(s); None

26 g) General Unsecured claims total \$17,802.00 at 100%

repayment.

For other Relief the court deems just and proper.

Date: September 3, 2024

/s/ Peter G. Macaluso
Peter G. Macaluso, Attorney at Law